REMARKS

Reconsideration of the present application, as amended, is respectfully requested. No claims have been amended, added, or cancelled.

Applicants wish to thank the Examiner for the courtesy of an interview on March 1, 2006. Unfortunately, no response was received to an email subsequently sent by Applicants. However, Applicants enclose the following arguments to further clarify the claims.

Examiner rejected claims 1-5, 7, 9, 11, 12, 14-19, 24-27, 31, 32, 36, 38-43, 46-53, 56-59, 62, 63 and 67-69 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,438,576 to Huang et al. in view of U.S. Patent No. 6,389,460 to Stewart et al.

The Examiner notes that Huang does not teach generating a cache lookup key based on the identity of the particular photographic image and the format specified by the Target device. The Examiner references Stewart for these elements.

Stewart discusses techniques for storing objects (e.g., images) in and retrieving objects from a storage device (e.g., image store) in a rapid and efficient manner. The Examiner points to column 11, lines 1-25 of Stewart for the element of "generating a cache lookup key based on the identity of the particular photographic image and the media format specified by the target device.

The portion of Stewart discussing caches states:

> Conventionally, in storing images in a cache of a proxy system, proxy systems have encoded the URL as a file and have stored the URL, cookie and authorization as distinct information in a database. However, such systems encode only the URL and thus prohibited the caching of unique objects where the URL is the same but the cookies and/or authorizations differ. Further, the file system was conventionally required to perform a comparison of the cached file names with the requested file

name which is a processing intensive operation given that the encoded URLs can reach several hundred or thousand characters a minute. Normally, a database design which uses the URL, cookie and authorizations as keys to identify unique locations in a database would also suffers from similar comparison overhead.

According to another aspect of the invention, most of the comparison overhead can be avoided because the location of the desired data is stored as a series of nested directories. Hence, the overhead needed with a conventional database are removed since a database engine is no longer required. With this aspect, the nested directories are formed using a combination of the URL, cookies and authorization. As a result, the URL, cookies and authorizations are all encoded and cached (i.e., stored in the image store). The requester is thus able to go directly to a directory location and once there either retrieves the data or fails to retrieve the data. File names stored at the directory location are relatively short so that any comparison complications are relatively small.

Thus, Stewart does <u>not</u> discuss differentiating based on <u>identity of the particular photographic image and the media format specified</u>. Rather, Stewart focuses on cookies and authorization. Stewart, in fact, <u>does not address media format-differentiation</u>. The Examiner points to column 11, lines 1-12, however that portion of Stewart does not address <u>media format-based caching</u>.

The concept of Stewart is to store data in nested directories so a look-up sequence for a particular image can be speedier (rather than requiring long string comparisons). However, Stewart does not discuss having multiple copies of a photographic image in different image formats stored in a cache, and performing a cache look-up based on the media format and image identity.

Therefore, Applicants respectfully submit that the claims are not obvious over Huang in view of Stewart.

Examiner rejected claims 6 and 41 under 35 U.S.C. §103(a) as being unpatentable over Huang in view of Stewart in further view of U.S. Patent No. 6,202,097 to Foster et al. Foster also does not teach or suggest generating a cache look-up key

based on the identity of a particular photographic image and the media format specified by the target device. Therefore, Foster does not cure the shortcomings of Huang in view of Stewart, discussed above.

Examiner rejected claims 8 and 70 under 35 U.S.C. §103(a) as being unpatentable over Huang in view of Stewart in further view of U.S. Patent No. 6,289,375 to Knight et al. Knight also does not teach or suggest generating a cache look-up key based on the identity of a particular photographic image and the media format specified by the target device. Therefore, Knight does not cure the shortcomings of Huang in view of Stewart, discussed above.

Examiner rejected claims 12 and 44 under 35 U.S.C. §103(a) as being unpatentable over Huang in view of Stewart in further view what is well known in the art. Applicants respectfully submit that alleged knowledge in the art does not include caching separately copies of photographic images in different formats.

Examiner rejected claims 10, 22, 23, 54, and 55 under 35 U.S.C. §103(a) as being unpatentable over Huang in view of Stewart in further view of U.S. Patent No. 6,141,686 to Jackowski et al. Jackowski also does not teach or suggest generating a cache look-up key based on the identity of a particular photographic image and the media format specified by the target device. Therefore, Jackowski does not cure the shortcomings of Huang in view of Stewart, discussed above.

Examiner rejected claims 29, 33-35, 61, and 64-66 under 35 U.S.C. §103(a) as being unpatentable over Huang in view of Stewart in further view of U.S. Patent No. 6,411,685 to O'Neal. O'Neal also does not teach or suggest generating a cache look-up key based on the identity of a particular photographic image and the media format

specified by the target device. Therefore, O'Neal does not cure the shortcomings of Huang in view of Stewart, discussed above.

Applicant respectfully submits that in view of the discussion set forth herein, the applicable rejections have been overcome. Accordingly, the present and amended claims should be found to be in condition for allowance.
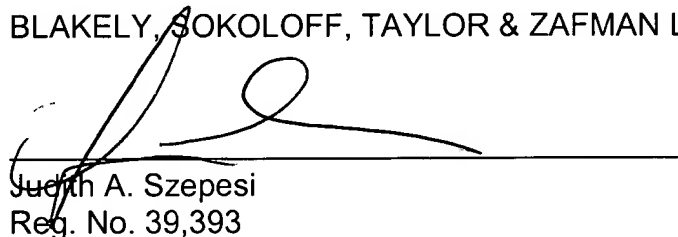
If a telephone interview would expedite the prosecution of this application, the Examiner is invited to contact Judith Szepesi at (408) 720-8300.

If there are any additional charges/credits, please charge/credit our deposit account no. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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